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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Billed Party Preference for	)	CC Docket No. 92-77
InterLATA 0+ Calls	)	
	)	

COMMENTS OF U S WEST, INC.

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U S WEST, INC.

Its Attorney

Of Counsel,
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July 17, 1996

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SUMMARY

Herein U S WEST[1] comments on the Commission's current proposal to bring some added market discipline to the matter of OSPs' 0+/- rates. We support a Commission-prescribed benchmark as the most appropriate alternative to BPP. A benchmark pricing model, embellished with appropriate disclosures, is the best targeted, most market efficient way to proceed.

Above a Commission-prescribed benchmark, U S WEST supports the Commission's proposal that price/rate disclosures (rather than other kinds of verbal warnings) form the most appropriate message content. Because the marketplace has not demonstrated any dysfunction with respect to the pricing/rating of the vast majority of 0+/- calls, we oppose a requirement that price disclosures be made on every such call. Since calls below any Commission-prescribed benchmark will be aligned, to a great extent, with existing consumer expectations, there is no public interest benefit from requiring disclosures on calls involving prices within the range of those expectations.

Price disclosures, then, should only be required on 0+/- calls that exceed a well-targeted Commission-prescribed benchmark. U S WEST supports flexibility with respect to the particular type of price/rate disclosure, believing that carriers are best-suited to determine the most appropriate disclosure to their circumstances.

[1] All abbreviations and acronyms used in this summary are fully defined in the text.

Should the Commission determine that a particular type of disclosure must be mandated, U S WEST supports an average price disclosure as being that which is most in the public interest. An average price disclosure avoids the predictable consumer avoidance associated with a "highest price" disclosure, avoids the overly-long message associated with a combined "highest price/average" disclosure, and avoids requiring consumers to do mathematical computations to calculate time-of-day/duration information as they are in the process of placing 0+/- calls.

U S WEST supports combining whatever disclosure message there is with the branding message of the carrier. Automated disclosures are the most cost effective and market efficient way to deliver meaningful price/rate information. The notion of on-line, real-time data base queries as forming an appropriate basis for a "time-of-day/duration of call" actual price quotation for specific calls should be rejected.

U S WEST supports the benchmark pricing model originally proposed by CompTel, i.e., that prices above a certain established complaint level would result in some consequential regulatory mandate, believing that it represents the most targeted regulatory intervention with respect to excessively priced 0+/- calls. Should the Commission reject that model, we support a benchmark price/rate proposal of the average of the Big Three IXCs' prices + 15%. As the Commission acknowledges, prices within the range of the Big Three form the foundation for substantial customer expectations. A benchmark set at that level, with a buffer to allow for differing OSP cost and rate structures, should go a long way to bring additional discipline to that marginal OSP market conduct that continues to operate contrary to the public interest.

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COMMENTS OF U S WEST, INC.

I. INTRODUCTION

U S WEST, Inc. ("U S WEST") is gratified that, at least for the time being, the Federal Communications Commission ("Commission" or "FCC") has determined the costs of implementing Billed Party Preference ("BPP"), through balloting and computer systems,[1] outweigh the benefits to the public.[2] We do not see that changing in the near future. Contrary to the Commission's tentative assumptions,

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[1] One could persuasively argue that BPP is currently a reality with respect to a vast majority of "away from home" callers, as they utilize calling cards, dial around, etc. to accomplish their calls. While the Commission cites to polls done by MCI Telecommunications Corporation, supporting the notion that customers would prefer to dial fewer numbers to reach their preferred long distance carrier (Further Notice n.18), U S WEST remains convinced that BPP is a solution that cries out for a different question: At what cost do customers want this facility? See, Reply Comments of U S WEST Communications, Inc., filed herein Sep. 14, 1994 at 20-27 ("USWC 1994 Reply"). And, what will be the significance of bundled service provider packages on this preference? The reward for doing the dialing may be such that the burden of doing the dialing has less and less market significance.

[2] In the Matter of Billed Party Preference for InterLATA 0+ Calls, CC Docket No. 92-77, Second Further Notice of Proposed Rulemaking, FCC 96-253, rel. June 6, 1996 ("Further Notice").

BPP will not be less costly to provision *via* local number portability (or "LNP") data bases, despite their advanced intelligent network ("AIN") backbone.[3] Thus, we see the Commission's current interim proposal as being one that will be part of the away-from-home calling marketplace for some considerable time to come.

For this reason, whatever consumer welfare model the Commission chooses at this time should be minimum and flexible. As demonstrated more fully below, both carrier and consumer interests are benefited by such approach. More intrusive regulatory interventions can always be implemented at some future point in time should they be deemed necessary, either to protect the public interest generally or as a remedial response to bad-acting OSPs.

U S WEST supports the Commission's determination that, if any disclosures are required to be made to consumers about 0+/- calls, price/rate disclosures are more appropriate messages than other types of verbal warnings suggested by earlier filings.[4] However, we do not believe the public interest requires price/rate disclosures on <u>every</u> interLATA 0+/- call.[5]

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[3] <u>See</u> <u>id.</u> ¶ 4 (suggesting that if "local exchange carriers ["LEC"] are required to install the facilities needed to perform database queries for number portability purposes for each call, the incremental cost to query the database for the customer's preferred OSP [operator service provider] might well be less than the incremental benefits that BPP would provide.").

[4] <u>Id.</u> ¶ 35.

[5] The caption for the <u>Further Notice</u> deals with interLATA 0+/- calls, as does much of the text. However, the Commission also, at times, makes reference simply to 0+/- calls. <u>See</u>, <u>e.g.</u>, <u>id.</u> ¶¶ 3, 4, 5, 15, 26. We believe that the Commission's instant proceeding is <u>confined</u> to <u>interLATA</u> and <u>interstate</u> 0+/- calling. U S WEST is not an OSP involved in such calling patterns, at the present time (although we do carry certain intraLATA, interstate calls). We acknowledge, however, that State Commissions might find whatever model the Commission adopts appropriate to

Customer expectations clearly do not suggest a need for such broad-based disclosures. Such disclosures are not made today, yet customer complaints regarding OSP rates are identifiable to a certain level of charges. To the extent price/rate disclosures are necessary at all, then, such disclosures should be required only when the price/rate for a call exceeds customers' expectations according to some pre-determined price/rate benchmark.

U S WEST continues to support the original CompTel proposal that regulatory remedial action in the area of OSP-processed calls is necessary at and above the point at which significant customer complaints occur.[6] While there are those who criticize this position,[7] there is no clearer demonstration of the outer boundaries of customer "expectations" than the taking of affirmative action to complain about assessed charges. Below that level, it is all a matter of generalization, averaging and speculation. Should CompTel's proposal be rejected, U S WEST supports the concept of requiring price disclosures only when an OSP's rates/charges are more than 15% above the averaged rates of the "Big Three" interexchange carriers ("IXC").

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their circumstances, as well. Thus, for the most part (and unless otherwise indicated), U S WEST herein addresses 0+/- calling without differentiating between the type or jurisdiction of the traffic.

[6] See Ex Parte filed herein, Mar. 8, 1995 on behalf of Competitive Telecommunications Association ("CompTel"), et al., "Rate Ceiling Alternative to Billed Party Preference" at 5-7 ("CompTel Proposal"). See also Reply Comments of U S WEST Communications, Inc., RM-8606 and CC Docket No. 92-77, filed Apr. 27, 1995 at 9-15 ("USWC 1995 Reply").

[7] Further Notice ¶ 17.

II. PRICE DISCLOSURES SHOULD BE LIMITED

A. Price Disclosures Should Not Be Required On All 0+/- Calls

The Further Notice evidences a clear Commission attempt to craft a solution in the 0+/- marketplace that is aligned with customer expectations.[8] Focusing on those expectations, it is clear that there is no need for price/rate disclosures on every 0+/- call.[9] In the absence of such market need, there appear to be no public interest benefits, only costs in requiring price disclosures on calls being rated in conformity with customer expectations.

Price disclosures should be required only on those calls where the rate/charge for the call would exceed customer expectations. Indeed, that is really the only time where a sound cost/benefit analysis would prove the appropriateness of such disclosures.

Price disclosures, whether they be disclosures of actual, average or maximum prices, come only with a cost -- both a cost to the provider (in increased systems investment and maintenance or labor expenses) and to the consumer (in increased

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[8] The Commission repeatedly makes the point that it seeks a solution to OSP overcharging that conforms to consumer expectations. See, e.g., id. ¶ 15 ("The vast majority of consumers use residential presubscribed lines or a calling card of one of the three largest interexchange carriers in terms of annual toll revenues and therefore they generally expect rate levels to be within a comparable range of the rates charged by the three largest carriers."); id. ¶¶ 13, 23, 35.

[9] Indeed, the Commission seeks comment on the notion of price disclosures on all calls not because the Commission has a sense that consumer expectations are generally compromised but in large part to educate customers to the fact that calls they make away from home may be more expensive than those they make (*via* 1+) from their homes.

holding times and the conveyance of information not deemed terribly significant or material to the vast majority of callers). Any type of price/rate disclosure involving all 0+/- calls would require either additional systems investment by carriers (if the disclosure were mechanized) or labor expense (if live operators were required). This additional investment and expense would have to be recovered not from all of the callers attempting 0+/- calls, but from those callers completing such calls (i.e., the only logical point of cost recovery).

Consumers will clearly "pay a price" for price/rate disclosures. The goal of this proceeding should be to target disclosures to those instances where consumers would be ready, willing and able to pay the additional price for the additional consumer protection. U S WEST does not believe that consumers want to burden the price of every 0+/- call with a "disclosure surcharge."

Price disclosures, particularly those deemed unnecessary or unhelpful by the calling public, could well lead to consumer aggravation and avoidance (either of the message or the carrier). It is predictable, for example, that customers will want to avoid on-line disclosures, at least once the novelty wears off.[10] If customers either have no easy way to get around an unwanted message (i.e., one that gives them maximum or average price information on a call they know will be under the maximum or the average), or are required to continually "press #" to bypass the

[10] Compare the Commission's reference to "APCC's concern about establishing a benchmark level that triggers a warning is that the warning not be triggered for 'rates well within consumer expectations' or else consumers will hear the message too often and tune it out." Further Notice ¶ 20 and n.54.

disclosure, they might soon learn that dialing around lets them avoid the message associated with a 0+/- call altogether. This might well encourage uneconomic dial-around calling (i.e., behavior caused by the unnecessary addition of a time-consuming variable).[11] Thus, U S WEST supports the idea of price disclosures only with respect to those calls that are priced in excess of a well-targeted Commission-prescribed benchmark.

B. Not All Price Disclosure Mandates Are Equal

1. Carriers Should Have Flexibility In Deciding The Appropriate Price/Rate Disclosure -- In No Event, Should Disclosures Of More Than The Average Price/Rate Per Call Be Mandated

The Commission suggests a number of possible disclosure practices. These range from disclosure of "the total charges for which [consumers] would be liable for the initial rate period and each subsequent rate period if those charges . . . exceed the benchmark[.]"[12] Alternatively, the Commission suggests that consumers might be sufficiently informed if advised of the highest amount that a caller might be

[11] U S WEST is of two minds regarding dial-around traffic. It is clear that the use of dial around demonstrates that customers know they have choices and knowledgeably act to realize those choices (thus, rendering the ongoing market need for BPP negligible). See USWC 1994 Reply at 7-9. But, on the other hand, dial-around traffic causes significant message toll revenue losses for toll carriers (such as USWC) and, at least in some circumstances, probably results in consumers paying more for toll services than they might if they did not dial around in the first instance.

[12] Further Notice ¶ 35.

charged for a seven minute domestic call; suggesting that an OSP who found such a disclosure misleading could also provide an "averaged" price.[13]

In those situations where an OSP will be charging above whatever benchmark the Commission determines as the most appropriate (U S WEST addresses the benchmark issue below), U S WEST supports carrier flexibility in the kind of disclosure to be made. Preliminarily, U S WEST believes that carrier disclosures of the average price/rate per call would provide the most meaningful price/rate information to consumers. Such a disclosure regime would benefit from uniformity among carriers and calls. But, more importantly, it would allow consumers the ability to receive relevant information without requiring them to engage in on-line mathematical computations about the number of minutes they expect to remain on the call and the rate variations that might occur during the call itself.

However, U S WEST can appreciate that carriers might well desire flexibility in the kind of disclosures they make. Some might want to provide only maximum price-of-the-call information; others might prefer disclosing average price/rate information; still others may want to provide time of day/duration information. Thus, we intend to review the filed comments carefully to ascertain whether our preliminary assessment, i.e., that average price information is the disclosure most in the public interest, is the most reasonable from a public interest perspective. In

[13] Id.

Reply Comments we will provide the Commission with our final position on this important matter.

With respect to regulatory mandates, however, we feel no need to take such a "wait-and-see" position. Nothing more than the disclosure of average price/rate information should be required. Such information can be combined, fairly easily, with a carrier's branding message,[14] reducing costs for carriers and cost-recovery from consumers. Mechanization provides for a lower cost base than live operator assistance. Therefore, it should be utilized as a disclosure solution whenever possible.

2. "Highest Price" Price/Rate Disclosures Do Not Appear, On Initial Analysis, To Be In The Public Interest

U S WEST opposes mandatory price disclosures of the "highest amount" of a seven-minute domestic call Such a disclosure is, by its nature, misleading or irrelevant to the vast majority of callers. As the Commission acknowledged, such a mandate would virtually require an OSP to make an additional, and separate, "average" price/rate disclosure in order to counteract predictable consumer avoidance.

Very few callers will be at the "highest rate" of a seven-minute domestic call. For that reason, it is an overreaching -- and potentially call discouraging -- type of

[14] Compare the Commission's observation that such a "disclosure requirement [would be] consistent with TOCSIA's directive" that OSPs identify themselves, and that price is undoubtedly a material identifier. Id. ¶ 36.

disclosure. Given that such a disclosure would have to be joined with an "average" price disclosure to depress consumer avoidance, the length of the disclosure part of the call itself will be long and tedious. Particularly for the caller who is both nowhere near the highest amount and is below the average with respect to call duration and price, such a disclosure is unnecessary and would be considered annoying and burdensome. For these reasons, disclosures of "highest prices" should not be mandated.

3. Initial Rate Period/Subsequent Rate Period Disclosures Should Not Be Mandated Unless They Could Be Mechanized, Like Average Price/Rate Disclosures, To Be Part Of The Original Branding Message

If a carrier were to decide to price above a Commission-prescribed benchmark, that carrier might determine that, rather than provide average price/rate information, the carrier chooses to provide information on price/rate per minute of a 0+/- call, disclosing whatever variations might exist for calls of longer duration (e.g., "The price of this call is x for the first xx minutes; y for each y minute thereafter."). Such a disclosure could be made in a manner similar to an average price/rate disclosure -- as part of the mechanized branding message, with the disclosure occurring as a part of the branding message recording.[15]

[15] For example, the recording could be systemized to change or roll over by time of day, providing generic "initial minute" and "subsequent minute" information for that time-of-day period.

The above example is, however, a far cry from that proposed by the Colorado Public Utilities Commission Staff. While that Staff might be correct in its observation that "'most, if not all, [OSPs] have the capability of accessing a data base that provides specific rates for the specific call in question,"[16] that does not mean that such systems can be easily or cheaply accessed in real time to secure specific call rating and to quote it to a customer <u>prior to the completion of the call</u>.[17] For example, U S WEST estimates that to mechanize a system that would allow for a data base dip for every 0+/- call would add about $.50[18] to each call.[19]

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[16] <u>Id.</u> ¶ 34 citing the comments of the Colorado Public Utilities Commission Staff filed Apr. 4, 1995, RM-8606, CC Docket No. 92-77.

[17] Such rating tables are currently used for occasional requests for "time and charges" quotations, which typically occur at the completion of the call.

[18] System changes would require extensive software and hardware changes for up to 23 operator switches, plus software and hardware modifications to our external rating system and numerous additional trunking facilities to accommodate the increase in trunk holding time.

[19] As stated above, the Commission's inquiry is fairly limited in scope. <u>See</u> note 5, <u>supra</u>. Given the limited time for response to the <u>Further Notice</u> and in hopes of providing the Commission with some factual cost-burden information, however, U S WEST did an internal analysis based on a yearly total 0+/- calling (including intrastate and interstate intraLATA calling). Because a data base dip solution could not be confined to the types of calls within the Commission's jurisdiction, and because there obviously is some state interest in such a solution, the total calling figures provided an appropriate foundation for the analysis. The systems investment to do a data base dip on each call attempt would be in the range of $6M. The cost recovery for that investment (<u>i.e.</u>, the $.50 per call) would be confined to completed calls. This example demonstrates the tremendous "overreaching" nature of a data base solution to deal with those limited number of 0+/- calls within the Commission's jurisdiction. All callers who completed 0+/- calls would be saddled with approximately a $.50 surcharge to resolve an extremely limited interstate problem.

In the name of carrier flexibility, U S WEST suspends judgment on whether carriers who desire to make "first minute, subsequent minute" disclosures should be permitted to do so. But we are opposed to any Commission mandate that such disclosures be made. Such disclosures take a longer message time than average price/rate disclosures, could be fairly complex (depending on a carrier's rate tables), and would require consumers to do mathematical computations as a part of their call processing activity (creating enough confusion that a caller might need the message repeated or may need to terminate the call in progress until the math is completed).

While we oppose a mandated time of day/duration of call price/rate disclosure generally, we urge the Commission in all events to reject such a disclosure model where the foundation of the model involves a real-time data base query to secure the price/rate information.

III. THE APPROPRIATE BENCHMARK

U S WEST supported the original CompTel benchmark proposal, targeted to get 0+/- rates "below the general threshold rate level that prompted 'virtually all complaints' in a 'representative sampling of complaints to the FCC about operator service charges.'"[20] The Commission notes that a number of commentors filed oppositions to this model, on the grounds that it was an inappropriate benchmark (based as it was on complaints) and that it still permitted excessive charges

[20] Further Notice ¶ 11 and n.29, citing to CompTel Proposal.

(charges below the level of those complained about but still high above the average of the larger carriers).[21]

While U S WEST believes that such a model is defensible,[22] the Commission seems to be more interested in a model based on the average of the charges of the top three IXCs. With respect to benchmarking rates at this level, particularly with respect to mandated disclosures, U S WEST believes that building in an additional 15% buffer is appropriate.[23] As the Commission notes, such a buffer would accommodate varying OSPs with varying cost structures and service categories.

Finally, U S WEST very much supports the Commission's proposal that any benchmark chosen needs to be simpler, rather than more complicated. As U S WEST stated in our earlier comments, the goal is to transfer, or shift, the "process burden" -- not make it more burdensome to all.[24]

IV. BPP WILL NOT BE LESS COSTLY TO DEPLOY WITH THE ADVENT OF LOCAL NUMBER PORTABILITY DATABASES

The Commission opines that it might cost less to implement BPP in an environment where LNP is provided *via* a data base solution. BPP then, according

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[21] Id. ¶ 17.

[22] USWC 1995 Reply at 1-4.

[23] Further Notice ¶ 24.

[24] In discussing "process burden," U S WEST agrees with the Commission that the appropriate market remedy in the instant situation, given the continuing volume of customer complaints, is to move away from enforcement *via* a tariff process (see Further Notice ¶¶ 38-47) and toward market information.

to the Commission, might become simply an incremental cost, riding on the number portability investment.[25] The Commission's assumption is incorrect.

As originally contemplated, BPP would have become an integral component or aspect of the LECs' Line Information Data Bases ("LIDB"). The overwhelming costs associated with BPP involved determining the called party's preference of carrier in an 0- calling environment, i.e., a collect call, so that an originating call could be routed in accordance with the called party's (rather than the calling party's) preferred carrier. To accomplish such routing, operator services systems would have required significant upgrades[26] and the various LIDB's would have had to be interconnected, so that the called party's preference could "override" the calling party's preference.[27]

LNP does not provide an alternative solution. First, unlike LIDBs that at least have the raw data on all called/calling parties in a carrier's serving area, the LNP data bases will be far less ubiquitous in their deployment and information.

[25] Id. ¶ 4.

[26] A significant BPP investment/expense component involved investment in OSS7 and additional signaling capacity.

[27] Such would have been accomplished, roughly, as follows: the calling party would place a collect call to the called party; the terminating LIDB would first check to determine whether the called party would even accept collect calls; **if so, the terminating LIDB would then have to determine the called party's preferred carrier and communicate it to the originating LIDB so that the call could be placed over the called party's preferred carrier, in the first instance.** The material identified in bold was not part of the original LIDB design or architecture and was one of the significant variables that rendered BPP so extremely expensive to implement.

LNP data bases will only be in existence in limited geographic areas.[28] Furthermore, they will only have the names and phone numbers of those customers who have "changed" service providers (thus needing the aid of an LNP to process the call in the first instance). From purely an information data base foundation, then, the LIDBs -- rather than LNPs -- still provide the most logical place for any BPP functionality.

Even if the LNPs did have the proper information foundation to support a BPP application, in order to make BPP work those LNPs would have to be interconnected -- similarly to the way that the LIDBs would have to be -- to make BPP operational. Since LNP queries will normally take place one switch away from the LEC terminating switch (except for local or intraLATA calls),[29] the LNP would not have the information necessary even to know whether the called party accepts collect calls (that information still residing in the LIDB). Thus, some kind of interconnection among the LNPs and the LIDBs would be required to render BPP operational in an LNP environment. Since interconnection costs would have to be incurred regardless of the data base used as the foundation, and since additional interconnections would be necessary if LNPs became involved, it would always make more sense to use the LIDBs as the information source (with its ubiquitous information), rather than the LNPs.

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[28] See In the Matter of Telephone Number Portability, CC Docket No. 95-116, RM 8535, First Report and Order and Further Notice of Proposed Rulemaking, FCC 96-286, rel. July 2, 1996.

[29] This N minus 1 query configuration is optimal so that the call does not go to a terminating switch only to have to be "sent back" for the query.

V. CONCLUSION

Because the marketplace has not demonstrated any dysfunction with respect to the pricing/rating of the vast majority of 0+/- calls, U S WEST does not support ubiquitous price/rate disclosures on all 0+/- interLATA calls. For calls above a Commission-prescribed benchmark (a certain complaint level or the average of the Big Three IXCs + 15%), U S WEST preliminarily supports a price/rate disclosure that provides average price information. At least as a first step, the Commission should work with an "average" price/rate disclosure, moving toward something more prescriptive in a targeted fashion with respect to those carriers whose charges continue to generate complaints.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 17th day of July, 1996, I have caused a copy of the foregoing **COMMENTS OF U S WEST, INC.** to be served via hand-delivery, upon the persons listed on the attached service list.

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